

EXHIBIT “M”

From: GARY LIGHTMAN garylighman@lightmanlaw.com 

Subject: Zekaria Deposition 5/28/24

Date: May 15, 2024 at 12:03 AM

To: Patrick Healey phealey@rebarkelly.com

Cc: Laver, Seth L. slaver@goldbergsegalla.com, Joseph Ross jross@goldbergsegalla.com, Gary Weiss wgary4109@gmail.com, sam gross charltonholdinggrouppllc@aol.com, Sam Gross Scg1212@gmail.com, Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN ltag8r@me.com

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Patrick,

This email will confirm that the Zekaria Defendants failed to appear as scheduled for their depositions on May 14, 2024. You did not obtain any Protective Order; you did not even file a motion for any relief; you simply and unilaterally failed to produce Daphne Zekaria for her deposition as scheduled, without our permission or consent, and without any Court Order.

We have re-scheduled Zekaria's deposition for May 28, 2024. An Amended Deposition Notice is attached to this email. Absent our consent or a Court Order, we intend to proceed forward with the Zekaria deposition on May 28, 2024. We will move for sanctions if Zekaria just doesn't show up, like she did for her depo scheduled for May 14.

Please be guided accordingly.

thx

Gary Lightman
cell 215-760-3000

attachment

cc: all counsel/parties



Amd.Depo.Notice.Zekaria...24.pdf

FYI--excerpt from today's Legal INTElligancer:

A pharmaceutical manufacturer based in China is facing a monetary sanction in a New Jersey court for failing to make its CEO available for a deposition in multidisciplinary litigation over alleged cancer-causing contamination in the blood pressure drug Valsartan.

Thomas Vanaskie, a former judge of the U.S. Court of Appeals for the Third Circuit who is now serving as a special master in the Valsartan MDL, ordered the sanctions in the case, which is being heard in federal court in Camden, New Jersey. He cited the failure by Zhejiang Huahai Pharmaceutical Co. to compel CEO Baohua Chen to sit for his deposition, and the company's violations of orders to produce certain documents.



Thomas Vanaskie of Stevens & Lee. Courtesy photo

Vanaskie, who is with Stevens &

Lee. Courtesy photo

Lee in Scranton, Pennsylvania, will set the amount of sanctions at a later date after hearing input from plaintiffs counsel about the costs and attorney fees associated with its efforts to obtain ZHP's compliance, and a proposed monetary penalty if it is believed such a measure is appropriate. He also sought the plaintiffs' input on an adverse-inference jury instruction concerning information that would have been disclosed in Chen's deposition and the documents.

—

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